

**PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and
VIGO COUNTY AIR POLLUTION CONTROL**

**Alcan Rolled Products
5901 North 13th Street
Terre Haute, Indiana 47804**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T167-5988-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source which consists of production equipment to reduce aluminum rolls into finished foil products.

Responsible Official: **Chris Koszewski**
Source Address: **5901 North 13th Street, Terre Haute, Indiana, 47804**
Mailing Address: **PO Box 1067, Terre Haute, Indiana 47808**
SIC Code: **3353**
County Location: **Vigo**
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) FP1 Rolling Mill, manufactured by Achenbach, identified as unit 001, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (2) Rolling Mill #15, manufactured by Pittsburg, identified as unit 002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (3) Rolling Mill #16, manufactured by Pittsburg, identified as unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003.
- (4) Rolling Mill #19, manufactured by Loewy Robertson, identified as unit 004, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
- (5) Rolling Mill #20, manufactured by Loewy Robertson, identified as unit 005, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.

- (6) Coil Annealing Furnace #1, manufactured by Gauthschi-Penta, identified as unit 006, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 006.
- (7) Coil Annealing Furnace #2, manufactured by Gauthschi-Penta, identified as unit 007, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 007.
- (8) Coil Annealing Furnace #3, manufactured by Gauthschi-Penta, identified as unit 008, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 008.
- (9) Coil Annealing Furnace #48, manufactured by Loftus, identified as unit 009, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 009.
- (10) Coil Annealing Furnace #49, manufactured by Loftus, identified as unit 010, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 010.
- (11) Coil Annealing Furnace #54, manufactured by Sunbeam, identified as unit 011, with a maximum heat input capacity of 15.0 million BTU per hour, using no control, and exhausting to stack 011.
- (12) Texturizer/Slitter #1, manufactured by ITAS, identified as unit 012, with a maximum capacity of 20,000 pounds per hour of aluminum, without control and without an exhaust stack.
- (13) Coil Annealing Furnace #4, manufactured by Gauthschi-GNA, identified as unit #13, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 013.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour. Alcan listed 75 facilities with a total heat in put capacity of 148.082 million BTU per hour in this category.
- (2) Rolling oil recovery systems.
- (3) Diesel emergency generators not exceeding 1600 horsepower.
- (4) Stationary fire pumps.

- (5) Other activities not previously identified:
- (a) Five (5) rolling oil coolant mixing tanks.
 - (b) Coil handling after removal from mills.
 - (c) Two (2) cooling towers.
 - (d) Four (4) rolling oil tanks.
 - (e) Three (3) propane storage tanks.
 - (f) Two (2) fuel oil storage tanks.
 - (g) Six (6) waste oil storage tanks.
 - (h) Vacuum Distillation Unit (VDU).
 - (i) Thirteen (13) welders for maintenance use.
 - (j) Wet grinders.
 - (k) Woodworking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield".

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and VCAPC.

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Vigo County Air Pollution Control.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (b) The Permittee shall furnish to IDEM, OAM and VCAPC, within a reasonable time, any information that IDEM, OAM and VCAPC, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM and VCAPC, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM and VCAPC, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM and VCAPC, or the U.S. EPA, to furnish copies of requested

records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and VCAPC).

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the sources compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and VCAPC, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM and VCAPC, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM and VCAPC, upon request and shall be subject to review and approval by IDEM, OAM and VCAPC.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

VCAPC

Telephone Number: 812-462-3433

Facsimile Number: 812-462-3447

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and VCAPC, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and VCAPC, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM and VCAPC, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM and VCAPC, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM and VCAPC, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and VCAPC, determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM and VCAPC, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and VCAPC, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and VCAPC, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and VCAPC, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and VCAPC, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and VCAPC, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM and VCAPC, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and VCAPC, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM and VCAPC, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM and VCAPC, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, VCAPC, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, VCAPC, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and VCAPC, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source.

In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and VCAPC nor an authorized representative, may disclose the information unless and until IDEM, OAM, and VCAPC makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, IDEM, OAM and VCAPC, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 **Transfer of Ownership or Operation** [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and VCAPC, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM and VCAPC, shall reserve the right to issue a new permit.

B.26 **Annual Fee Payment** [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM and VCAPC, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM and VCAPC the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM and VCAPC.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

no later than thirty-five (35) days before the intended test date. The Permittee shall submit a notice of the actual test date to the above addresses so that is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and VCAPC within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM and VCAPC, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation.

In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM and VCAPC, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM and VCAPC, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and VCAPC upon request and shall be subject to review and approval by IDEM, OAM and VCAPC. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within “normal” parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM and VCAPC, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and VCAPC shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and VCAPC within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and VCAPC reserve the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM and VCAPC may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement, certified pursuant to the requirements of 326 IAC 2-6 that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and VCAPC, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and VCAPC may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon request of an IDEM, OAM and VCAPC, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or VCAPC makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and VCAPC, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

1. FP1 Rolling Mill, manufactured by Achenbach, identified as unit 001, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
2. Rolling Mill #15, manufactured by Pittsburg, identified as unit 002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
3. Rolling Mill #16, manufactured by Pittsburg, identified as unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003.
4. Rolling Mill #19, manufactured by Loewy Robertson, identified as unit 004, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
5. Rolling Mill #20, manufactured by Loewy Robertson, identified as unit 005, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 VOC General Reduction Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) FP1 Rolling Mill (Unit 001) is subject to BACT. BACT for this facility has been determined to be Norpar 15 rolling oil (or equivalent) and a Munters Euroform mist eliminator with 72% removal efficiency for the droplet phase of the VOC emissions. This corresponds to a limit of 123.30 tons of VOC per 12-month period, rolled monthly. This requirement, along with the removal of another mill (at the time of installation) rendered 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for all these facilities and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1), (6)]

During the period between 18 and 24 months after issuance of this permit, the Permittee shall perform droplet phase VOC removal testing on FP1 rolling mill, utilizing a method acceptable to IDEM, OAM and VCAPC. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM and VCAPC may require compliance testing when necessary to determine if the facility is in compliance.

D.1.4 Volatile Organic Compounds (VOC)

Pursuant to PC 84-1740-00001 issued by IDEM and revised on June 25, 1993 and again on April 12, 1995, the mist eliminator for droplet phase VOC control shall be in operation at all times when FP1 cold rolling mill (unit 001) is in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 coolant records shall be maintained. Records maintained for this provision shall be taken monthly and shall be complete and sufficient to establish compliance. These records shall include date, coolant type used, coolant quantity used, daily production records to back calculate the daily coolant usage, and a demonstration that the coolant is equivalent to Norpar 15 (if alternate type is utilized).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

1. Coil Annealing Furnace #1, manufactured by Gauthschi-Penta, identified as unit 006, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 006.
2. Coil Annealing Furnace #2, manufactured by Gauthschi-Penta, identified as unit 007, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 007.
3. Coil Annealing Furnace #3, manufactured by Gauthschi-Penta, identified as unit 008, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 008.
4. Coil Annealing Furnace #48, manufactured by Loftus, identified as unit 009, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 009.
5. Coil Annealing Furnace #49, manufactured by Loftus, identified as unit 010, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 010.
6. Coil Annealing Furnace #54, manufactured by Sunbeam, identified as unit 011, with a maximum heat input capacity of 15.0 million BTU per hour, using no control, and exhausting to stack 011.
7. Coil Annealing Furnace #4, manufactured by Gauthschi-GNA, identified as unit #13, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 013.
8. Texturizer/Slitter #1, manufactured by ITAS, identified as unit 012, with a maximum capacity of 20,000 pounds per hour of aluminum, without control and without an exhaust stack.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM)

Pursuant to Operating Permit 01-3353-01-93 the particulate matter emissions from these coil annealing furnaces shall not exceed 0.15 pounds per million BTU. The equivalent emissions per 12-month period are as follows:

Unit ID	Input Heat Rating (MMBTU/Hr)	Tons PM per 12-month period
unit 006	14.1	9.264
unit 007	14.1	9.264
unit 008	14.1	9.264
unit 009	13.9	9.132
unit 010	13.9	9.132
unit 011	15.0	9.855
unit 013	14.1	9.264

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for all these facilities and any control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM and VCAPC may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM and VCAPC, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Particulate Matter (PM)

The particulate matter limitation under D.2.1 above shall be maintained by utilizing natural gas only for fuel.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Reporting Requirements

The natural gas certification to document compliance with Condition D.2.1 and D.2.4 when the furnaces are burning natural gas, shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Alcan Rolled Products
Source Address: 5901 North 13th street, Terre Haute, Indiana 47804
Mailing Address: PO Box 1067, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-5988-00001

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865
and
VIGO COUNTY AIR POLLUTION CONTROL
201 Cherry Street
Terre Haute, Indiana 47807
Phone: 812-462-3433
Fax: 812-462-3447**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Alcan Rolled Products
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47804
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-5988-00001

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC), within four (4) business hours (OAM: 1-800-451-6027 or 317-233-5674, ask for Compliance Section; VCAPC: 812-462-3433); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: OAM: 317-233-5967; VCAPC: 812-462-3447), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED CERTIFICATION**

Source Name: Alcan Rolled Products
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47804
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-5988-00001

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Unit Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Alcan Rolled Products
Source Address: 5901 North 13th Street, Terre Haute, Indiana 47804
Mailing Address: PO Box 1607, Terre Haute, Indiana 47808
Part 70 Permit No.: T167-5988-00001

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management
and
Vigo County Air Pollution Control

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Alcan Rolled Products
Source Location:	5901 North 13th Street, Terre Haute, Indiana 47804
County:	Vigo
SIC Code:	3353
Operation Permit No.:	T167-5988-00001
Permit Reviewer:	Rob Harmon

Vigo County Air Pollution Control (VCAPC) has reviewed a Part 70 permit application from Alcan Rolled Products relating to the operation of production equipment to reduce aluminum rolls into finished foil products.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) FP1 Rolling Mill, manufactured by Achenbach, identified as unit 001, with a maximum capacity of 146,120 pounds per hour of aluminum, using a mist eliminator as control, and exhausting to stack 001.
- (2) Rolling Mill #15, manufactured by Pittsburg, identified as unit 002, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 002.
- (3) Rolling Mill #16, manufactured by Pittsburg, identified as unit 003, with a maximum capacity of 17,100 pounds per hour of aluminum, without control, and exhausting to stack 003.
- (4) Rolling Mill #19, manufactured by Loewy Robertson, identified as unit 004, with a maximum capacity of 34,400 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 004.
- (5) Rolling Mill #20, manufactured by Loewy Robertson, identified as unit 005, with a maximum capacity of 28,700 pounds per hour of aluminum, using a demister pad as control, and exhausting to stack 005.
- (6) Coil Annealing Furnace #1, manufactured by Gauthschi-Penta, identified as unit 006, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 006.

- (7) Coil Annealing Furnace #2, manufactured by Gauthschi-Penta, identified as unit 007, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 007.
- (8) Coil Annealing Furnace #3, manufactured by Gauthschi-Penta, identified as unit 008, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 008.
- (9) Coil Annealing Furnace #48, manufactured by Loftus, identified as unit 009, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 009.
- (10) Coil Annealing Furnace #49, manufactured by Loftus, identified as unit 010, with a maximum heat input capacity of 13.9 million BTU per hour, using no control, and exhausting to stack 010.
- (11) Coil Annealing Furnace #54, manufactured by Sunbeam, identified as unit 011, with a maximum heat input capacity of 15.0 million BTU per hour, using no control, and exhausting to stack 011.
- (12) Texturizer/Slitter #1, manufactured by ITAS, identified as unit 012, with a maximum capacity of 20,000 pounds per hour, without control and without an exhaust stack.
- (13) Coil Annealing Furnace #4, manufactured by Gauthschi-GNA, identified as unit #13, with a maximum heat input capacity of 14.1 million BTU per hour, using no control, and exhausting to stack 013.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour. Alcan listed 75 facilities with a total heat in put capacity of 148.082 million BTU per hour in this category.
- (2) Rolling oil recovery systems.
- (3) Diesel emergency generators not exceeding 1600 horsepower.
- (4) Stationary fire pumps.

- (5) Other activities not previously identified:
 - (a) Five (5) rolling oil coolant mixing tanks.
 - (b) Coil handling after removal from mills.
 - (c) Two (2) cooling towers.
 - (d) Four (4) rolling oil tanks.
 - (e) Three (3) propane storage tanks.
 - (f) Two (2) fuel oil storage tanks.
 - (g) Six (6) waste oil storage tanks.
 - (h) Vacuum Distillation Unit (VDU).
 - (i) Thirteen (13) welders for maintenance use.
 - (j) Wet grinders.
 - (k) Woodworking operations.

Existing Approvals

The source has been operating under the following approvals:

- (1) Operating Permit 01-3353-01-93 issued by VCAPC on June 14, 1993.
- (2) Operating Permit 01-3353-02-94 issued by VCAPC on June 14, 1993 and revised by VCAPC on June 6, 1994.
- (3) Operating Permit 01-3353-03-93 issued by VCAPC on June 14, 1993.
- (4) Operating Permit 01-3353-04-93 issued by VCAPC on June 14, 1993.
- (5) Registration 167-V015-00001 issued by VCAPC on November 27, 1996.
- (6) Construction Permit CP 167-2386-00001 issued by IDEM-OAM on May 19, 1994.
- (7) Construction Permit PC 84-1740-00001 issued by IDEM and revised by IDEM on June 25, 1993 and again on April 12, 1995.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996. Additional information was received on October 16, 1996.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	<100
PM-10	<100
SO ₂	<100
VOC	>100
CO	<100
NO _x	>100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Xylene	<10
Ethyl Benzene	<10
TOTAL	<25

- (a) The potential emissions (as defined in the Indiana Rule) of VOC and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

And/or

- (b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects **1996** emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.356
PM-10	0.356
SO ₂	0.082
VOC	746.8
CO	2.59
HAP (specify)	NA
NO _x	11.87

County Attainment Status

The source is located in Vigo County.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	attainment
PM-10	attainment
SO ₂	maintenance
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) Unit 012 (#1 Texturizer/Slitter for Aluminum Foil) is not subject to New Source Performance Standards (NSPS) under 326 IAC 12 and 40 CFR 60 Subpart TT because Alcan uses a food grade wax which contains no VOC.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), unit 001 (cold rolling mill FP1) is subject to BACT. BACT for this facility has been determined to be Norpar 15 rolling oil (or equivalent) and Munters Euroform mist eliminator with 72% removal efficiency for the droplet phase of the VOC emissions.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM and VCAPC, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (1) The FP1 Rolling Mill has applicable compliance monitoring conditions as specified below:

The mist eliminator to remove droplet phase VOC shall be in operation at all times the mill is in operation.

These monitoring conditions are necessary in order to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

- (2) The annealing furnaces have applicable compliance monitoring conditions as specified below:

The furnaces have to utilize natural gas only for fuel.

These monitoring conditions are necessary in order to meet the requirements of operating permit 01-3353-01-93.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.

Conclusion

The operation of this operation of production equipment to reduce aluminum rolls into finished foil products shall be subject to the conditions of the attached proposed **Part 70 Permit No. T167-5988-00001**.

Description of facility: FP1 Rolling Mill
Max Rating: 146,120 pounds per hour
Construction Date:
Control Device (if any): Mist Eliminator
Stack/Vent ID: Stack 001

Facility class: Rolling Mill **Description:** Alters the physical thickness of coils of Aluminum

EMISSION LIMITATIONS	
Numerical Emission Limit:	72% droplet phase VOC removal efficiency, utilization of Norpar 15 rolling fluid (or equivalent)
Regulation/Citation:	PC 84-1740-00001, in order to avoid 326 IAC 2-2 (Prevention of Significant Deterioration)
Compliance Demonstration:	testing, monitoring
PERFORMANCE TESTING	
Parameter/Pollutant to be Tested:	Droplet phase VOC removal
Testing Method/Analysis:	Approved by IDEM and VCAPC
Testing Frequency/Schedule:	Between 18 and 24 months after issuance of Part 70 Permit
Submittal of Test Results:	Within 45 days after completion of test, to VCAPC and IDEM-OAM
COMPLIANCE MONITORING	
Monitoring Description:	Operation of mist eliminator
Monitoring Method:	Continuously operate mist eliminator when FP1 rolling mill is in operation
Monitoring Regulation/Citation:	PC 84-1740-00001
Monitoring Frequency:	all times in operation
RECORD KEEPING	
Parameter/Pollutant to be Recorded:	type of rolling fluid used, quantity of rolling fluid used, demonstration that equivalent to Norpar 15 (if other)
Recording Frequency:	daily
REPORTING REQUIREMENTS	
Information in Report:	All information to demonstrate compliance
Reporting Frequency/Submittal:	When requested
Additional Comments:	

Description of facility: Coil Annealing Furnaces #1, #2, #3, #48, #49, #54, and #4
Max Rating: varies between 13.9 million BTU per hour to 15.0 million BTU per hour
Construction Date: varies
Control Device (if any): none
Stack/Vent ID: varies

Facility class: combustion **Description:** Changes the physical properties of milled aluminum by heat treating

EMISSION LIMITATIONS	
Numerical Emission Limit:	0.15 pounds particulate matter per million BTU heat input
Regulation/Citation:	Operating Permit 01-3353-01-93
Compliance Demonstration:	natural gas use
PERFORMANCE TESTING	
Parameter/Pollutant to be Tested:	NA
Testing Method/Analysis:	NA
Testing Frequency/Schedule:	NA
Submittal of Test Results:	NA
COMPLIANCE MONITORING	
Monitoring Description:	NA
Monitoring Method:	NA
Monitoring Regulation/Citation:	NA
Monitoring Frequency:	NA
RECORD KEEPING	
Parameter/Pollutant to be Recorded:	NA
Recording Frequency:	NA
REPORTING REQUIREMENTS	
Information in Report:	certification that natural gas is only fuel being utilized in these units
Reporting Frequency/Submittal:	quarterly
Additional Comments:	

Indiana Department of Environmental Management
Office of Air Management
 and
Vigo County Air Pollution Control

Addendum to the Technical Support Document (TSD)
 for a Part 70 Operating Permit

Source Name:	Alcan Rolled Products
Source Location:	5901 North 13th Street, Terre Haute, Indiana 47804
County:	Vigo
SIC Code:	3353
Operation Permit No.:	T167-5988-00001
Permit Reviewer:	Rob Harmon

On November 25, 1997, Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune Star in Terre Haute, Indiana, stating that Alcan Rolled Products had applied for a Part 70 Operating Permit to operate production equipment to reduce aluminum rolls into finished foil products. The notice also stated that VCAPC proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On December 22, 1997 comments were received from Mr. David W. Paul of HOK/K Industrial on behalf of Alcan Rolled Products. These comments were as follows:

1. Comment
 Section A.2 - Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]
 - (1) "FP1 Rolling Mill, Manufactured by Achenbach, identified as unit 001, with a maximum capacity of 146,120 pounds per hour, using a mist eliminator as control and exhausting to stack 001." This statement should specify. "... with a maximum capacity of 146,120 pounds per hour of aluminum ..."
 - (2) Same as comment (1), does not indicate that maximum capacity is for the amount of aluminum.
 - (3) Same as comment (1), does not indicate that maximum capacity is for the amount of aluminum.
 - (4) Same as comment (1), does not indicate that maximum capacity is for the amount of aluminum.
 - (5) Same as comment (1), does not indicate that maximum capacity is for the amount of aluminum.
 - (12) "Texturizer/Slitter #1, manufactured by ITAS, identified as unit 012, with a maximum capacity of 10,000 pounds per hour, without control, exhausting to stack 012." We request that this condition state, "Texturizer/Slitter #1, manufactured by ITAS, identified as unit 012, with a maximum capacity of 20,000 pounds of aluminum per hour, without controls and without an exhaust stack."

Response

The requested upgrades were made.

2. Comment
 Section A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]

- (2) "Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6." We request that this condition be removed as degreasing operations no longer occur on-site.

Response

The activity was removed and the rest of the list was renumbered.

3. Comment

Section C.19 General Recordkeeping Requirements [326 IAC 2-7-5(3)(B)]

- (a) "Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and VCAPC, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request." We would like to request that the following provision be added to this statement, "... These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and VCAPC, representative, for a minimum of three (3) years. The previous months data will be made available within a period of 45 days of the end of that month. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request,"

Response

The request asks for 45 days to obtain the prior months information. In the permit, the reporting condition (C.20) allows 30 days to supply information for the previous month. IDEM and VCAPC believe that a 30 day period is sufficient and the condition will not change.

4. Comment

Section D.1 - Facility operation Conditions

- (1) "FP1 Rolling Mill, Manufactured by Achenbach, identified as unit 001, with a maximum capacity of 146,120 pounds per hour, using a mist eliminator as control and exhausting to stack 001." We request this condition specify "... with a maximum capacity of 146,120 pounds per hour of aluminum ...".
- (2) Same as comment (1), does not indicate that maximum capacity is for the amount of aluminum.
- (3) Same as comment (1), does not indicate that maximum capacity is for the amount of aluminum.
- (4) Same as comment (1), does not indicate that maximum capacity is for the amount of aluminum.
- (5) Same as comment (1), does not indicate that maximum capacity is for the amount of aluminum.

Response

The requested upgrades were made.

5. Comment

Section D.1.2 - Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

"A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for all these facilities and any control device." We request this statement specify, "... is required for the mist eliminator in use on Rolling Mill FP-1, and the demister pads in use on Rolling Mill #19 and Rolling Mill #20."

Response

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- 1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7- 4(c)(9);
- 2) Implement the preventive maintenance plan; and,

3) Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (a) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (b) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (c) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, compliance monitoring will never be necessary, it does state that a compliance monitoring plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above. However, there are some types of operations that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance. Therefore the requirement has to stay as proposed.

6. Comment

Section D.1.5(a) - Record Keeping Requirements

"To document compliance the Condition D.1.1 coolant records shall be maintained. Records maintained for this provision shall be taken monthly and shall be complete and sufficient to establish compliance. These records shall include date, coolant type used, coolant quantity used, daily production records to back calculate the daily coolant usage, and a demonstration that the coolant is equivalent to Norpar 15 (if alternate type is utilized)." We request that this record keeping requirement be modified to state the following, "... Records maintained for this provision shall be based on measured monthly consumption of coolant with an allowance applied for recovered coolant, which shall be measured quarterly. Inventory reconciliation will be conducted quarterly. These records shall include date, coolant type used, coolant quantity used, monthly and daily production records to back calculate the monthly and daily coolant usage, and a demonstration that the coolant is equivalent to Norpar 15 (if alternate type is utilized)." This request is made, due to the size of the used oil tanks and operational restrictions on the soluble oil recovery and recycling system, that prevent accurate measurement of the amount of used oil on a monthly basis. Accurate production records (amount of aluminum and coolant sprayed) will be kept on a monthly and daily basis, to provide an avenue for back calculating the amount of coolant used during these periods. This data will be monitored closely to help prevent excursions and the quarterly record keeping will allow Alcan to accurately report coolant loss and emissions.

Response

Quarterly compiling of this data is not frequent enough. The monthly data can be estimated, and then when a more detailed quarterly audit is performed the data can be updated. However, the monthly estimates need to be as accurate as possible.

7. Comment

Section D.2.5 - Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

"The natural gas certification to document compliance with Condition D.2.1 and D.2.4 when the furnaces are burning natural gas, shall be submitted quarterly to the address listed in Section C - General Reporting Requirements, of this permit." We request that this record keeping and reporting requirement be removed as the natural gas combustion sources are permitted at maximum capacity and cannot be fired at a higher rate without physically modifying the sources.

If IDEM is concerned that an alternate fuel will be used for these sources, we would prefer that a provision requiring notification of that use be included instead of a quarterly affirmation of the use of natural gas.

Response

This is the standard method to track fuel type used. This condition does not require Alcan to indicate how much natural gas is used, only that it is used.

VCAPC and the Office of Air Management (OAM) have determined the following upgrades were needed in this permit.

1. Comment

In the TSD (page 7, item (3)) a thermal oxidizer is mentioned, but it is not mentioned in the permit under either Section A or Section D.

Response

The naphtha utilized has been removed from the process and the associated control equipment is no longer needed. Alcan certified that they would not start this process up again and wanted all references removed from the permit. The language has been removed.

2. Comment

Under Condition D.2.3 there is an incorrect reference to condition D.1.1, it should be D.2.1.

Response

The reference was updated.

3. Comment

Under Sections D.1.2 and D.2.2 the reference to Section B - Preventive Maintenance Plan would be more clear as Section B.12 - Preventive Maintenance Plan.

Response

The upgrade was made.

4. Comment

The standard language under Condition B.11 has changed from "... certify that the source has complied ..." to "... submit a compliance certification report which addresses the status of the source's compliance ...".

Response

The language was upgraded.

5. Comment

Condition C.2 is now federally enforceable.

Response

The sentence "This condition is not federally enforceable." was removed.

6. Comment

Condition C.3 has been upgraded to more specifically outline which parts are not federally enforceable.

Response

The upgrade was made.

7. Comment

Condition C.4 is now federally enforceable.

Response

The sentence "This condition is not federally enforceable." was removed.

8. Comment

Condition C.5 has been upgraded to the following: "The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable."

Response

The condition was upgraded.

9. Comment

Condition C.20 - General Reporting Requirements has been upgraded to more clearly state what reports are required to be submitted and when.

Response

The condition was upgraded to the new standard language.

On June 5, 1998 a substantial revision was made to the Model Part 70 permit. These revisions have to be incorporated in all permits in the process, even if they had already cleared public notice. The following changes were made in this permit (~~strikeout~~ indicates language removed, **redline** indicates language added).

1. The Source Summary under Section A was upgraded.

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC), ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

2. The Condition A.5 under Section A was upgraded.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

3. The Condition B.1(b) under Section B was upgraded.

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

4. The Condition B.8(c) under Section B was upgraded.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM and VCAPC, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall** furnish such records to IDEM, OAM and VCAPC, along with a claim of confidentiality under 326 IAC 17.

If requested by IDEM, OAM and VCAPC, or the U.S. EPA, **to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

5. The Condition B.11(c) under Section B was upgraded.

(c) The annual compliance certification report shall include the following:

- (1) The identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was **based on** continuous or intermittent **data**;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
- (5) **Any insignificant activity that has been added without a permit revision; and**
- ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM and VCAPC, may require to determine the compliance status of the source.

~~The notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. The Condition B.12(a) under Section B was upgraded.

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

7. The Condition B.14 under Section B was upgraded.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- ~~(a)~~ (b) The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~
- (1) The applicable requirements are included and specifically identified in this permit; ~~or~~
 - (2) ~~IDEM, OAM and VCAPC, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- ~~(b)~~ (c) ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM and VCAPC, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(c)~~ (d) ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM and VCAPC, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~
- ~~(d)~~ (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- ~~(f)~~ (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(g)~~ (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM and VCAPC, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(h)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM and VCAPC, has issued the modification. [326 IAC 2-7-12(b)(8)]

8. The Condition B.16(b), (c) and (d) under Section B was upgraded.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(c)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(d)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9. The Condition B.18 under Section B was upgraded.

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and VCAPC, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

10. The Conditions B.19, B.20, and B.21 under Section B was removed and replaced with B.19.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

With all subsequent conditions being renumbered.

11. The description under Condition B.24 (formerly B.26) under Section B was upgraded.

Upon presentation of ~~IDEM or VCAPC~~ proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, VCAPC, U.S. EPA, or an authorized representative to perform the following:

12. The Condition B.25(b) (formerly B.27) under Section B was upgraded.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. ~~The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

13. The Condition B.26(a) and (c) (formerly B.28) under Section B was upgraded.

- (a) The Permittee shall pay annual fees to IDEM, OAM and VCAPC, within thirty (30) calendar days of receipt of a billing, ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ ~~If the Permittee does not receive a bill from IDEM, OAM and VCAPC the applicable fee is due April 1 of each year.~~

- (c) ~~If the Permittee does not receive a bill from IDEM, OAM and VCAPC, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

14. The description under Condition C.1 under Section C was upgraded.

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) ~~and 40 CFR 52.21~~, this source is a major source.

15. The new Condition C.2 under Section C was added.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

With all subsequent conditions being renumbered.

16. The Condition C.7 (formerly C.6) under Section C was upgraded.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

17. The Conditions formerly C.7 and C.13 under Section C were removed and replaced with C.8.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

18. The Condition C.9 (formerly C.8) under Section C was upgraded.

C.9 Performance Testing ~~[326 IAC 3-2.1]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM and VCAPC.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

no later than thirty-five (35) days before the intended test date. The Permittee shall submit a notice of the actual test date to the above addresses so that is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and VCAPC within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM and VCAPC, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

19. The Condition C.10 (a) and (c) (formerly C.9) under Section C was upgraded.

- (a) ~~Has certified that all facilities at this source are in compliance with all applicable requirements; and Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (c) ~~Will comply with such applicable requirements that become effective during the term of this permit. Has certified that all facilities at this source are in compliance with all applicable requirements.~~

20. The Condition C.11 (formerly C.10) under Section C was upgraded.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee ~~may extend compliance schedule an additional ninety (90) days provided the Permittee shall~~ notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

in writing, ~~prior to the end of the initial ninety (90) day compliance schedule no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date, and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

21. The Condition C.13 (formerly C.12) under Section C was upgraded.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the ~~applicable~~ requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

22. The Condition C.14(b) and (c) under Section C was upgraded.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM and VCAPC, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM and VCAPC, shall supply such plan.~~

23. The rule cites in Condition C.15 under Section C was upgraded.

C.19 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 1-6]

24. The Condition C.16 under Section C was upgraded.

C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

25. The Condition C.17(a) under Section C was upgraded.

- (a) The Permittee shall submit an ~~certified~~, annual emission statement, **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

26. The Condition C.19(a) under Section C was upgraded.

C.23 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM and VCAPC, representative, ~~for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request providing they are made available within thirty (30) days after written request. If the Commissioner or VCAPC makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.**

27. The Condition C.20 under Section C was upgraded.

C.24 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and VCAPC, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

(1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

(2) ~~An emergency as defined in 326 IAC 2-7-1(12); or~~

(3) ~~Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

(4) ~~Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

28. The descriptions under each Section D was upgraded.

The language **Facility Description [326 IAC 2-7-5(15)]** was added to each Section. Also the numbers in each description section were removed.

29. The Condition D.1.3 under Section D was upgraded.

D.1.3 Testing Requirements **[326 IAC 2-7-6(1),(6)]**

During the period between 18 and 24 months after issuance of this permit, the Permittee shall perform droplet phase VOC removal testing on FP1 rolling mill, utilizing a method acceptable to IDEM, OAM and VCAPC. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. **In addition to these requirements, IDEM and VCAPC may require compliance testing when necessary to determine if the facility is in compliance.**

30. The Condition D.2.3 under Section D was upgraded.

D.2.3 Testing Requirements **[326 IAC 2-7-6(1)]**

~~Testing of The Permittee is not required to test this facility these facilities is not specifically required by this permit. However, IDEM and VCAPC may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM and VCAPC, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

31. The Certification Form, Quarterly Compliance Form, and the Emergency/ Deviation Occurrence Form all were upgraded.

The forms were replaced with the new ones.

On July 10, 1998 another revision was made to the Model Part 70 permit. These revisions have to be incorporated in all permits in the process, even if they had already cleared public notice. The following changes were made in this permit (~~strikeout~~ indicates language removed, **redline** indicates language added).

1. The Condition B.14(b) under Section B was upgraded.

- (b) ~~The provisions of this permit take precedence over previous conditions relating to an applicable requirement established by a previously issued permit.~~ **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

On September 28, 1998 VCAPC was notified to change the Assistant Commissioner signature block from Felicia R. George to Janet G. McCabe. The change was made in this permit.

Additional changes to the permit were made as follows:

1. The potential emissions table in the TSD should include the numeric thresholds, not simply an indication of greater than or less than. The table was upgraded.

Pollutant	Potential Emissions (tons/year)
PM	<100
PM-10	<100
SO ₂	<100
VOC	>100
CO	<100
NO _x	>100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Xylene	<10
Ethyl Benzene	<10
TOTAL	<25

2. The Source Status portion of Condition A.1 (General Information) of the permit should not have any reference to the Emission Offset Rules. The section was upgraded.

Source Status: Part 70 Permit Program
Major Source, under PSD or Emission Offset Rules;

3. The facility descriptions in Sections D.1 and D.2 need to be more clear. They were both upgraded.
4. The specific tons per 12-month period emission limit needs to be added to Condition D.1.1 (VOC General Reduction Requirements) of the permit. The condition was upgraded.

D.1.1 VOC General Reduction Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6(General Reduction Requirements) FP1 Rolling Mill (Unit 001) is subject to BACT. BACT for this facility has been determined to be Norpar 15 rolling oil (or equivalent) and a Munters Euroform mist eliminator with 72% removal efficiency for the droplet phase of the VOC emissions. **This corresponds to a limit of 123.30 tons of VOC per 12-month period, rolled monthly.** This requirement, along with the removal of another mill (at the time of installation) rendered 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

5. Condition D.1.4 (Volatile Organic Compounds) of the permit is in the wrong section. It was moved.
6. Comment
The specific tons per 12-month period emission limits need to be added to Condition D.2.1 (Particulate Matter) of the permit. The condition was upgraded.

D.2.1 Particulate Matter (PM)

Pursuant to Operating Permit 01-3353-01-93 the particulate matter emissions from these coil annealing furnaces shall not exceed 0.15 pounds per million BTU. **The equivalent emissions per 12-month period are as follows:**

Unit ID	Input Heat Rating (MMBTU/Hr)	Tons PM per 12-month period
unit 006	14.1	9.264
unit 007	14.1	9.264
unit 008	14.1	9.264
unit 009	13.9	9.132
unit 010	13.9	9.132
unit 011	15.0	9.855
unit 013	14.1	9.264

7. IDEM and VCAPC revised the standard language on Condition C.3 (Opacity) to more accurately reflect the current rule language.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity in twenty-four (24) consecutive readings;~~ **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

Additionally, the table of contents was upgraded to reflect the correct page numbers after all the changes were completed.